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**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Friday, March 20, 2009

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Subject: Removal Action
DLH Plating Site
2801 Grand Avenue, Cleveland, OH
Latitude: 41.4847
Longitude: -81.6281

POLREP No.:	9	Site #:	B5NQ
Reporting Period:	3/6/2009 - 3/27/2009	D.O. #:	31
Start Date:	11/11/2008	Response Authority:	CERCLA
Mob Date:	11/11/2008	Response Type:	Time-Critical
Completion Date:		NPL Status:	Non NPL
CERCLIS ID #:	OHN 000510286	Incident Category:	Removal Action
RCRIS ID #:		Contract #	68-S5-03-01

Site Description

See POLREP #1 for Site Description.

Current Activities

On March 6, 2009, ERRS continued categorization and bulking of chemicals from the Chemical Storage Room and the Laboratory. ERRS completed removal of acid process lines and general cleanup of debris in Room A. Sixteen (16) cubic yards of hazardous waste solids [Hazardous Waste Solid, D006, D007, F006, F007] were removed from the Site in a roll-off box and transported to Envirite of Ohio, Inc. for disposal. Forty (40) cubic yards of RCRA empty containers and debris were transported off site to American Landfill for disposal.

On March 9, 2009, ERRS began placing high cyanide waste into cubic yard Gaylord boxes, pumping standing water out of the building from weekend rain events, and began an asbestos survey of the building in preparation for demolition activities. ERRS continued re-solidification of sludge inside the hazardous waste roll-off boxes. Forty (40) cubic yards of RCRA empty containers and debris were transported off site to American Landfill for disposal.

On March 10, 2009, ERRS continued bulking of high cyanide sludge into Gaylord boxes, continued decanting and removal of PVC acid piping throughout the building, and began the clean-up of floor debris in Room D. Standing rain water continued to be pumped from the building throughout most of the day. Completed the asbestos survey of the entire building. Thirty-three (33) cubic yards of hazardous waste solids [Hazardous Waste Solid, D006, D007, F006, F007] were removed from the Site in a roll-off box and transported to Envirite of Ohio, Inc. for disposal.

On March 11, 2009, ERRS continued pumpin rain water from the floor. ERRS continued the removal of general floor debris and continued packaging high cyanide waste into cubic yard Gaylord boxes in Room D. ERRS removed Tank #7 and the associated acid product piping. Four wall core samples were collected along the frontage of the building in order to characterize the hazardous characteristics of the wall for disposal purposes. ERRS conducted a site walk for bidding demolition contractors.

On March 12, 2009, ERRS continued placing the high cyanide sludge into cubic yard Gaylord boxes and continued decanting and removal of PVC acid piping in the building. Representatives from the North East Ohio Regional Sewer District and City of Cleveland Fire Department were on Site to conduct a periodic inspection of the building.

On March 13, 2009, ERRS continued decanting and cutting PVC acid piping throughout the building and continued loading high cyanide sludge into cubic yard Gaylord boxes. Decontaminated tanks staged outside were rendered non-reusable. Sixteen (16) cubic yards of hazardous waste solids [Hazardous Waste Solid, D006, D007, F006, F007] were removed from the Site in a roll-off box and transported to Envirite of Ohio, Inc. Forty (40) cubic yards of RCRA empty containers and debris were transported off site to American Landfill.

On March 16, 2009, ERRS continued cutting PVC acid piping throughout the building and continued decontaminating cyanide tanks. ERRS began and completed the decontamination of the floor in Room D. Forty (40) cubic yards of RCRA empty containers and debris were transported off site to American Landfill. Scrap steel was transported off site for recycling.

On March 17, 2009, ERRS completed decontamination of the floor in Rooms L, F, and a portion of the floor in Room M. ERRS continued removal and solidification of sludge from Tank 51 and placing sludge into cubic yard Gaylord boxes. Scrap steel was transported off site for recycling.

On March 18, 2009, ERRS completed decontamination of the floor in Room B and a portion of the floor in Room M. ERRS continued assembling and loading cubic yard Gaylord boxes with high cyanide sludge from Tank 51 and re-packaged some damaged cubic yard Gaylord boxes. Ohio EPA arrived on site to collect four (4) mercury containing devices removed from the building for recycling at Bowling Green State University. Scrap steel was transported off site for recycling.

On March 19, 2009, ERRS completed decontamination of the floor in Room M. ERRS continued assembling and re-packaging damaged cubic yard Gaylord boxes with high

cyanide waste. Tanks 58, 59 and 115 are the only tanks remaining inside the building. These tanks are being used to containerize water from floor decontamination activities. All other tanks have been decontaminated, removed from the building, rendered non-reusable, and will be recycled as scrap steel. The scrubber unit in the Boiler Room was removed from the building. ERRS continued decanting and cutting down of PVC acid piping throughout the building. Twenty-two (22) cubic yards of hazardous waste solids [Hazardous Waste Solid, D003, D006, F006, F007] were removed from the Site in cubic yard Gaylord boxes and transported to Envirite of Ohio, Inc. Scrap steel was transported off site for recycling.

On March 20, 2009, ERRS removed and disposed of empty drums, tumblers, scrubber ventilation duct, etc. located outside the south wall of Room M. ERRS decanted and removed overhead acid piping in the building. ERRS continued re-packaging high cyanide sludge into new cubic yard boxes.

On March 23, 2009, EERS decanted and removed overhead acid piping in the building. ERRS removed the ductwork over the former plating line in Room M. ERRS pumped liquid from the cyanide sludge roll-off box into totes and further solidified the cyanide sludge with solidification material provided by Envirite of Ohio, Inc. ERRS pressure washed the building floor in Rooms L and M. Forty (40) cubic yards of hazardous waste solids (Hazardous Waste Solid, D006, D007, F006, F007) were removed from the Site in roll-off boxes and transported to Envirite of Ohio, Inc. Envirite also removed one (1) empty roll-off box from the Site. Forty (40) cubic yards of RCRA empty containers and debris were removed from the Site in a roll-off box and transported to American Landfill.

On March 24, 2009, ERRS decanted and removed overhead acid piping in the building. ERRS further solidified the cyanide sludge in the roll-off box with solidification material provided by Envirite of Ohio, Inc. ERRS consolidated waste material in drums and transferred material from deteriorating drums into new drums. ERRS excavated and capped four (4) PVC pipes entering the Pump House and back filled the excavation. ERRS pressure washed the building floor in Room M. ERRS and START visually inspected the roof of the building along Evarts Street to identify any unknown hazards (tanks, drums, etc.) that need to be addressed prior to demolition. ERRS and START observed no additional tanks, drums, or other containers with the ability to hold/store potential hazardous substances.

On March 25, 2009, ERRS further solidified the cyanide sludge in the roll-off box with solidification material provided by Envirite of Ohio, Inc. ERRS consolidated waste material in drums and transferred material from deteriorating drums into new drums. ERRS pressure washed the building floor in Rooms M and G. ERRS cut up empty totes and drums and placed them into a non-haz roll-off box for disposal. Cleveland Public Power was on site to plan the discontinuation of electrical services from the Site. Ohio EPA was on site to conduct a walk through of the Site.

On March 26, 2009, ERRS re-packaged cyanide sludge from damaged cubic yard boxes and the cyanide sludge roll-off box into new, nylon-reinforced cubic yard boxes. ERRS consolidated waste material in drums and transferred material from deteriorating drums into new drums. ERRS cut up empty tanks, totes, and drums and placed them into a non-haz roll-

off box for disposal. ERRS cut up and removed a condensate tank from the second floor of the building and placed it into a non-haz roll-off box for disposal. ERRS pressures washed heavy equipment, including the excavator and man-lift. Forty (40) cubic yards of RCRA empty containers and debris were removed from the Site in a roll-off box and transported to American Landfill for disposal.

On March 27, 2009, ERRS cut up empty tanks, totes, and drums and placed them into a non-haz roll-off box for disposal. ERRS pressure washed the interior of the Pump House. ERRS cut tanks T126-T130 down to the bottom of the tank to prevent them from holding any liquids. ERRS removed several float switches containing mercury from the Pump House. OBO Construction was on site to plan the demolition of the frontage portion of the building along Evarts Street. Envirite was on site to sample the cubic yard boxes containing high cyanide sludges to determine which boxes contain high levels of cyanide and cannot be treated for disposal by Envirite. A tanker truck removed 4,525 gallons of waste liquid (Waste Corrosive Liquid, Basic, Inorganic) from the Pump House, tanks and totes containing cyanide rinse water, and two floor sumps in Room G and transported the waste liquid to Vickery Environmental, Inc. for disposal. Envirite removed one empty roll-off box and one roll-off box containing solidification material from the Site.

Activities performed by START from March 6, 2009 to March 27, 2009 included: written and photographic documentation of Site activities and conditions; and performing air monitoring during Site activities.

Planned Removal Actions

ERRS will continue to perform the following activities: lab packing and disposal of laboratory chemicals; removal and disposal of cubic yard boxes containing high cyanide sludge, pressure washing the building floor, removal and disposal of incompatible drums; and coordinating transportation and disposal of waste material.

START will continue to document Site activities and conditions.

Next Steps

Prior to demolition activities, ERRS will remove and dispose of plywood on the exterior building wall along Evarts Street, decontaminate the interior and exterior building walls along Evarts Street with a chlorine bleach solution, discontinue natural gas and water services to the Site from an off-site point along the supply lines. ERRS will perform demolition of the frontage portion of the building along Evarts Street. Following demolition activities, ERRS will install a security fence along Evarts Street. ERRS will also perform general Site clean-up, discontinue electrical and other services to the Site, and demobilize site personnel and equipment.

Key Issues

The demolition activities for this Removal Action will be limited to the frontage portion of the building along Evarts Road (Room L, Room F, Room E, and a portion of Room D).

U.S. EPA Region V ORC is preparing to place a CERCLA lien on the property for the cost

of the removal action at the Site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$900,000.00	\$730,316.00	\$169,684.00	18.85%
RST/START	\$105,000.00	\$89,776.00	\$15,224.00	14.50%
Intramural Costs				
Total Site Costs	\$1,005,000.00	\$820,092.00	\$184,908.00	18.40%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Disposition of Wastes

Total to Date:

80,540 gallons of Hazardous Waste Liquids N.O.S. D006, D007 (Chromium, Cadmium) have been transported to Vickery for disposal.

23,750 gallons of Hazardous Waste Liquids D006, D007, F006 (Chromium, Cadmium, Cyanide) have been transported to Vickery for disposal.

20,850 gallons of Waste Chromic Acid Solution D002, D004, D006, D007 have been transported to Vickery for disposal.

18,526 gallons of Waste Corrosive Liquid, Basic, Inorganic N.O.S. have been transported to Vickery for disposal.

375 cubic yards of Hazardous Waste Solid D006, D007, F006, F007 (Chromium, Cadmium) have been transported to Envirite of Ohio, Inc. for disposal.

22 cubic yards of Hazardous Waste Solid D003, D006, F006, F007 (Chromium, Cadmium) have been transported to Envirite of Ohio, Inc. for sampling, laboratory analysis and disposal.

480 cubic yards of RCRA empty containers and debris have been transported to American

Landfill for disposal.

Four (4) mercury containing items transported to Bowling Green State University for recycling.

See Previous POLREPs for Waste Disposition listings prior to March 27, 2009.

Waste Stream	Quantity	Manifest #	Disposal Facility
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D006, D007, F006, F007	16 yards	001594104	Envirite of Ohio, Inc., Canton, Ohio
RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	375260	American Landfill, Waynesburg, Ohio
RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	375261	American Landfill, Waynesburg, Ohio
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D006, D007, F006, F007	16 Cubic Yards	001594106	Envirite of Ohio, Inc., Canton, Ohio
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D006, D007, F006, F007	17 Cubic Yards	001594120	Envirite of Ohio, Inc., Canton, Ohio
RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	375266	American Landfill, Waynesburg, Ohio
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D006, D007, F006, F007	16 Cubic Yards	001594107	Envirite of Ohio, Inc., Canton, Ohio
RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	375262	American Landfill, Waynesburg, Ohio
Elemental Mercury	4 items	NA	OEPA / Bowling Green State University
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D003, D006, F006, F007	22 Cubic Yards	001594453	Envirite of Ohio, Inc., Canton, Ohio
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D003, D006, F006, F007	15 Cubic Yards	001594105	Envirite of Ohio, Inc., Canton, Ohio
RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	NA	American Landfill, Waynesburg, Ohio
RQ, NA3077, Hazardous Waste Solid, N.O.S. (Chromium, Cadmium), 9, PG, D003, D006, F006, F007	25 Cubic Yards	001594129	Envirite of Ohio, Inc., Canton, Ohio

RCRA empty containers and debris, Profile 104621OH	40 Cubic Yards	NA	American Landfill, Waynesburg, Ohio
RQ, Waste Corrosive Liquid, Basic, Inorganic, N.O.S., Mixture, 8, UN3266, II	4525 Gallons	002009787	Vickery Environmental, Inc., Vickery, Ohio

www.epaossc.net/DLHPlating